

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

SHANDON LYNN DAVIS

Case No.

1:21-mj-30498

Judge: Morris, Patricia T.

Filed: 10-25-2021 At 11:44 AM

CMP USA v. Shandon Lynn Davis (krc)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 21 & 29, 2021 in the county of Isabella in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

- |  |   |
|--|---|
| 1. Mich. Comp. Laws § 750.226, 18 U.S.C. §§ 1151 and 1152.               | 1. Carrying a Dangerous Weapon with Unlawful Intent.                                      |
| 2. Mich. Comp. Laws § 750.540(4) and (5)(b), 18 U.S.C. §§ 1151 and 1152. | 2. Interference with a telephone communication involving an incident resulting in injury. |
| 3. 18 U.S.C. § 113 (a) (4), 18 U.S.C. §§ 1151 and 1152.                  | 3. Assault by Striking.   |
| 4. 21 U.S.C. § 844 (a), 18 U.S.C. §§ 1151 and 1152.                      | 4. Possession of a Controlled Substance (methamphetamine).                                |

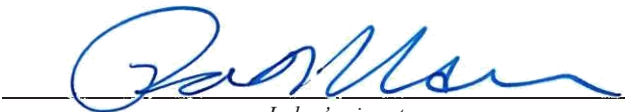
This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT.

☒ Continued on the attached sheet.

*Complainant's signature*

Nicholas Diedrich, Detective/Sergeant

*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: October 25, 2021City and state: Bay City, Michigan

*Judge's signature*

Patricia T. Morris, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT  
FOR SHANDON LYNN DAVIS**

I, Nicholas Diedrich, being duly sworn, depose and state:

1. I am a detective/sergeant with the Saginaw Chippewa Tribal Police Department and have been employed there for approximately three years. I have almost 14 years' experience as a law enforcement officer and am also a sworn Bureau of Indian Affairs (BIA) federal officer. The following is based on statements from witnesses and statements from other law enforcement officers and individuals.

2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that Shandon Lynn Davis committed the following offenses that:

- Carrying a Dangerous Weapon with Unlawful Intent on September 21, 2021, in violation of Mich. Comp. Laws § 750.226, 18 U.S.C. §§ 1151 and 1152;
- Interference with a telephone communication involving an incident resulting in injury on September 21, 2021, in violation of Mich. Comp. Laws § 750.540(4) and (5)(b), 18 U.S.C. §§ 1151 and 1152;

- Assault by Striking on September 21, 2021, in violation of 18 U.S.C. § 113(a)(4), 18 U.S.C. §§ 1151 and 1152; and
- Possession of a Controlled Substance (methamphetamine) on September 29, 2021, in violation of 21 U.S.C. § 844(a), 18 U.S.C. §§ 1151 and 1152.

This affidavit does not contain all the facts known to me. Additionally, unless otherwise noted, wherever I assert that an individual made a statement, that statement is described in summary and is not intended to be a verbatim recitation.

3. According to T.H., a non-Indian, she was physically assaulted by her spouse and intimate partner, Shandon Lynn Davis, an Indian, on September 21, 2021 at their residence at 7221 E. Tomah Road, Chippewa Township, Isabella County, Michigan within the Isabella Reservation in Indian country within the Eastern District of Michigan.

4. According to T.H., Davis physically assaulted her by striking her multiple times with a handbag and her closed fists while they were in the bedroom of the residence. The assault resulted in visible bruises on her arms. T.H. said that during the assault Davis left the bedroom

and went into a different room. Davis came back into the bedroom with a purple and black handgun and pointed it at T.H.'s head stating, "I'm not scared of nobody, I'll kill any motherfucker." At some point during the physical assault in the bedroom, Davis reached inside of T.H.'s purse and took T.H.'s wallet and cell phone. As a result, T.H. was unable to call for help.

5. On September 29, 2021, police executed a search warrant at the residence. During the execution of the search warrant, officers found Davis lying on a bed in her bedroom on top of a pipe containing methamphetamine. Also recovered from the top drawer of a nightstand in the bedroom was a black eyeglasses case containing a jar with approximately .29 grams of methamphetamine and a clear plastic container containing approximately 1.52 grams of crystal methamphetamine. The substance in the clear plastic container field tested positive for the presence of methamphetamine using TruNarc. TruNarc is a reliable and generally accepted tool for testing for the presence of controlled substances. In that same nightstand officers located and recovered a purple and black 9 mm pistol with a magazine and a round of 9 mm ammunition in the chamber. Located and

recovered from a large safe in the master bedroom was a Q-Link ZTE cell phone that belonged to T.H.

6. Based on this information, there is probable cause to believe that on or about September 21 and 29, 2021, Shandon Lynn Davis committed the offenses specified in paragraph two.



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Nicholas Diedrich  
Saginaw Chippewa Tribal Police

Sworn to before me and signed  
in my presence and/or by reliable  
electronic means on this  
25th day of October, 2021.



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Patricia T. Morris  
United States Magistrate Judge